

# Exhibit 3

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**From:** Kel McClanahan, Esq. <kel@nationalsecuritylaw.org>  
**Sent:** Saturday, October 1, 2022 1:58 AM  
**To:** FOIArequest  
**Subject:** New FOIA request (2 of 2)  
**Attachments:** !2022-10-01 - Authorization and Privacy Waiver (combined).pdf

On behalf of my clients Takao Yamada and Julio Miguel Cury David, I hereby request an electronic copy of all records, including emails, in the U.S. Embassy in Santo Domingo, including but not limited to the Regional Security Office, including any permutations of Mr. Cury's name (including permutations which lack "David").

I have attached the appropriate authorization paperwork for your records. It may also assist you to know that Mr. Cury's previous visa number was PII .

Please note that in the Western District of Washington, where Mr. Yamada resides, it has been previously held that Section 222(f) of the Immigration and Nationality Act, upon which State regularly relies in similar situations as this, does not apply to visa revocations. *Guerra v. United States*, No. 09-1027, 2010 U.S. Dist. LEXIS 132999, at \*5 (W.D. Wa. Dec. 15, 2010). Given that any judicial review of State's response will take place in the Western District of Washington (since Mr. Cury does not reside in the United States), and that this holding is not unique or a fluke, see also *Mantilla v. Dep't of State*, No. 12-21109, 2012 U.S. Dist. LEXIS 136152, at \*11 (S.D. Fla. Sept. 24, 2012), we accordingly anticipate that State will not waste any time arguing that any records about Mr. Cury's visa revocation can be withheld under Exemption (b)(3).

Since this is a first-party request for a small number of easily locatable records, my clients do not anticipate being assessed any fees. Please provide all responsive records in electronic format.

Thank you for your prompt attention to this request.

Your cooperation in this matter would be appreciated. If you wish to discuss this request, please do not hesitate to contact me.

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"As a general rule, the most successful man in life is the man who has the best information."

Benjamin Disraeli, 1880

"Quis custodiet ipsos custodes?" ("Who will watch the watchers?")

Juvenal, Satire VI